

EXHIBIT A

Facebook's Proposed Case Schedules
Proposed Schedule #1: Two-Phase Discovery Model

| FB's Dates | Deadlines |
|---|--|
| PHASE 1 – Discovery and Summary Judgment Regarding Individual Plaintiffs | |
| December 10, 2019 | Initial Disclosures (Including disclosure of users' emails and/or phone numbers) |
| August 7, 2020 | Close of Phase 1 Fact Discovery |
| August 21, 2020 | Expert disclosures ¹ |
| September 11, 2020 | Rebuttal expert disclosures |
| November 13, 2020 | Facebook's Motion for Summary Judgment |
| December 18, 2020 | Plaintiffs' Summary Judgment Opposition |
| January 22, 2021 | Facebook's Summary Judgment Reply |
| ~ February 19, 2021 | Hearing on Motion for Summary Judgment |
| PHASE 2 – Class Cert + Class Merits | |
| Immediately following order on Motion for Summary Judgment | Phase 2 discovery begins |

¹ It is not clear to Facebook that experts will be necessary in Phase 1 and Facebook's proposal of these expert-related deadlines is not a concession that experts should or will actually be used during this Phase.

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| June 25, 2021 | Class Certification Motion |
| June 25, 2021 | Disclosure of Plaintiff Class Certification Experts |
| August 6, 2021 | Class Certification Opposition |
| August 6, 2021 | Disclosure of Facebook Class Certification Experts |
| September 3, 2021 | Class Certification Reply |
| September 3, 2021 | Disclosure of Class Certification Rebuttal Experts |
| October 6, 2021 | Hearing on Class Certification |
| November 1, 2021 | Close of Phase 2 discovery |
| February 11, 2022 | Classwide Summary Judgment Motions |
| March 18, 2022 | Classwide Summary Judgment Oppositions |
| April 22, 2022 | Classwide Summary Judgment Replies |
| May 27, 2022 | Hearing on Classwide Summary Judgment |
| September 12, 2022 | Pretrial Conference |
| September 26, 2022 | Trial Start |

Proposed Schedule #2: Single Phase Discovery Model

| Dates | Deadlines |
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| December 10, 2019 | Initial Disclosures (Including disclosure of users' emails and/or phone numbers) |
| May 21, 2021 | Disclosure of Plaintiffs' expert witnesses in support of Motion for Class Certification and service of related expert reports |
| May 21, 2021 | Class Certification Motion and Facebook's Motion for Summary Judgment on Individual Claims |
| July 2, 2021 | Disclosure of Facebook's expert witnesses in opposition to Motion for Class Certification and service of related expert reports |
| July 2, 2021 | Facebook's Class Certification Opposition and Plaintiffs' Individual Summary Judgment Opposition |
| July 30, 2021 | Plaintiffs' Class Certification Reply and Individual Summary Judgment Reply |
| July 30, 2021 | Disclosure of Plaintiffs' rebuttal expert witnesses in support of Motion for Class Certification and service of related expert report(s) |
| August 27, 2021 | Hearing on Class Certification and Motion for Summary Judgment |
| October 15, 2021 | Close of Discovery |
| November 12, 2021 | Disclosure of expert witnesses and service of related expert reports |
| December 17, 2021 | Disclosure of rebuttal expert witnesses and service of related expert reports |

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| January 21, 2022 | Deadline for expert discovery (i.e., deadline for taking depositions of experts) |
| February 18, 2022 | Deadline for non-dispositive motions (expert) |
| March 18, 2022 | Classwide Summary Judgment Motion |
| April 22, 2022 | Classwide Summary Judgment Oppositions |
| May 27, 2022 | Classwide Summary Judgment Replies |
| July 1, 2022 | Hearing on Summary Judgment |
| September 9, 2022 | Pretrial Conference |
| August 23, 2022 | Trial Start |